

Claim: L462149

By: Bob Milane **Sep 30, 2011 08:38 AM**
Topic: Coverage Consideration **Confidential:** No
Related To: L462149
Subject: PRIVILEGED AND CONFIDENTIAL
ATTORNEY WORK PRODUCT

I reviewed with Deb and Rhea this morning and elected to transfer file to Rhea since MCS90 is his strong suit. I set up a conference call for 4:00 today with Rhea

By: Bob Milane **Sep 29, 2011 04:46 PM**

User: Amanda Beedie Page 86 12/22/2014 08:12 AM

CANAL 000162

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Topic: Coverage Consideration
Related To: L462149
Subject: DJ Action

Confidential: No

Met with Rhea Fleming, Ed Cotton, Jan Stroud, Darrell Pitts, Sharon Murphy, Brian Krawczyk, and Tim Barrett. Issue was amount of defense costs being incurred. Central to that issue was the status of the Declaratory Judgment action from the Claims Legal Team. To date the DJ has not been filed. Deb Molitz was out for the day, but I was able to reach her. The DJ has been delayed due to letters that need to be sent to the estates of the plaintiffs. Tim Barrett advised that she wants to know - by next week - the status of the DJ and our (Claims Legal) chance of success in prevailing.

By: Deb Molitz
Topic: Coverage Consideration
Related To: L462149
Subject: privileged and confidential atty client communication

Sep 26, 2011 10:26 AM
Confidential: Yes

reviewed draft DJ and determined letters to estates are necessary. will draft letters this week and after issue, DJ will be filed.

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By: Sharon Murphy **Jun 30, 2011 03:12 PM**
Topic: General **Confidential:** No
Related To: L462149
Subject: RE FRANCEWARE
THIS FILE IS NOT DEFENDING = THAT IS OTHER FILE - SENT TO ALL INVOLVED BUT MOORE FILE IS HANDLING DEFENSE OF EST
FRANCEWARE

User: Amanda Beedie

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12/22/2014 08:12 AM

CANAL 000164

Claim: L462149

By: Sharon Murphy Jun 29, 2011 01:42 PM
Topic: Litigation Confidential: No
Related To: L462149
Subject: RE FRANCEWARE

APPEARS OTHER FILE INVOLVED IN ACCIDENT WOULD HAVE THIS APPEARS THEY WERE FORWARDED THIS BY ATTY

By: Sharon Murphy Jun 29, 2011 01:36 PM
Topic: General Confidential: No
Related To: L462149
Subject: LEGAL

SENDS AGAIN THE INFO REQUESTING WE
PROVIDE DEFENSE FOR ESTATE OF FRANCEWARE XMEX & STRADER'S 1ST SUPP RESPONSE TO RFD

By: Sharon Murphy Jun 28, 2011 12:26 PM
Topic: Litigation Confidential: No
Related To: L462149
Subject: UPDATE - RINCON - DEFENSE UNDER ROR

RECEIVED REQUEST FROM COUNSEL FOR LOPEZ PLTFS THEY WANT SOMEONE TO OFFER DEFENSE FOR ESTATE OF ROGER
FRANCEWARE SENDS COPY OF LETTER FROM JIM ADLER & ASSOCIATES LAWSUIT NAMING ROGER FRANCEWARE AS
DEFENDANT WANTS SOMEONE TO PROVIDE DEFENSE ESTATE OF FRANCEWARE IS NAMED AS DEFENDANT IN AMENDED PETITION

WHY WOULD THIS FILE TAKE UP THE DEFENSE???